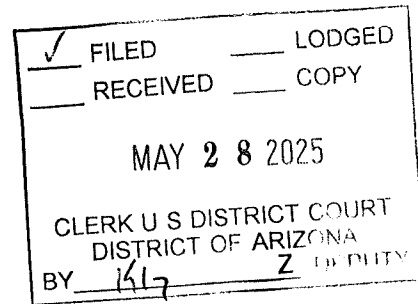


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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

vs.

Nicholas Anthony Lawrence,
Defendant.

No. **CR-25-00817-PHX-GMS (MTM)**

INDICTMENT

VIO: 18 U.S.C. § 1028(A)
(Aggravated Taking of Identity)
Count 1

18 U.S.C. § 1546(a)
(Fraud and Misuse of Visas,
Permits, and Other Documents)
Count 2

18 U.S.C. § 2250(a)
(Failure to Register as a Sex
Offender)
Count 3

8 U.S.C. § 1326(a) and (b)(1)
(Reentry of Removed Alien)
Count 4

THE GRAND JURY CHARGES:

COUNT 1

On about or between December 12, 2024 and December 27, 2024, in the District of Arizona, the defendant, NICHOLAS ANTHONY LAWRENCE, did knowingly possess and use, without lawful authority, a means of identification of another person during and

1 in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: 18 U.S.C. §
2 1546, Fraud or Misuse of Visas, Permit, and Other Document, as alleged in Count 2,
3 knowing that the means of identification belonged to another actual person.

4 All in violation of Title 18, United States Code, Section 1028A(a)(1).

5 **COUNT 2**

6 On about or between December 12, 2024 and December 27, 2024 in the District of
7 Arizona, the defendant, NICHOLAS ANTHONY LAWRENCE, did knowingly use and
8 attempt to use a document prescribed by statute or regulation for entry into or as evidence
9 of authorized stay or employment in the United States, to wit: a Driver's License and Social
10 Security Card in the name B.H., knowing these documents were forged, counterfeited,
11 altered, falsely made and otherwise unlawfully obtained.

12 All in violation of Title 18, United States Code, Section 1546(a).

13 **COUNT 3**

14 Beginning on or after November 4, 2022 and continuing through March 31, 2025,
15 in the District of Arizona, NICHOLAS ANTHONY LAWRENCE, a person required to
16 register under the Sex Offender Registration and Notification Act (SORNA), by reason of
17 a conviction under Arizona state law, to wit: Attempt to Commit Molestation of a Child,
18 in violation of A.R.S. §§ 13-1410, 13-1001, 13-1401, 13-1410, 13-3821, 13-610, 13-701,
19 13-702, 13-705, and 13-801 in Maricopa Superior Court Case CR2016-005292-001,
20 traveled in interstate and foreign commerce, and knowingly failed to register and update a
21 registration under SORNA.

22 All in violation of Title 18, United States Code, Section 2250(a).

23 **COUNT 4**

24 On or about March 31, 2025, at or near Mesa, in the District of Arizona, the
25 defendant NICHOLAS ANTHONY LAWRENCE, an alien, was found in the United States
26 after having been previously denied admission, excluded, deported, and removed from the
27 United States at or near Alexandria, Louisiana, on November 3, 2022, and not having obtained
28 the express consent of the Attorney General or the Secretary of Homeland Security to

1 reapply for admission to the United States.

2 All in violation of Title 8, United States Code, Section 1326(a) and enhanced by
3 (b)(1).

4
5 A TRUE BILL

6
7 /s/
8 FOREPERSON OF THE GRAND JURY
Date: May 28, 2025

9 TIMOTHY COURCHINE
10 United States Attorney
District of Arizona

11
12 /s/
13 ROSS ARELLANO EDWARDS
Assistant U.S. Attorney